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Attorneys for Defendant
CARLOS GUERRERO-ELENES

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARLOS GUERRERO-ELENES,

Defendant.

Case No.: CR 16-0469 MMC

**STIPULATION AND ~~[PROPOSED]~~ ORDER RE
CONTINUANCE OF MAY 3, 2017 HEARING**

This matter is currently set for a status/possible change of plea hearing on May 3, 2017. The defense is on track to resolve this matter by way of an open plea. However, the defense requires additional time to resolve additional and necessary issues prior to the entry of a plea.

Based on the foregoing, defense counsel requests, the government agrees, and the parties jointly stipulate that the hearing in this matter should be continued to June 6, 2017, at 2:15 p.m., to allow for the effective preparation of counsel. The parties further agree and stipulate that the time from May 3, 2017, through and including June 6, 2017, may be time excluded from the Speedy Trial Act, in order to ensure the reasonable time necessary for

effective preparation of counsel, pursuant to Title 18, United States Code Sections 3161(b), (h)(7)(A), (h)(7)(B)(iv).

Additionally, the parties request and stipulate that the supervised release matter, CR 07-0645 MMC, that is trailing this case, also be continued to June 6, 2017.

SO STIPULATED.

Respectfully submitted,

BRIAN J. STRETCH
United States Attorney

Dated: April 28, 2017

_____/s/_____
SAMANTHA SCHOTT
Special Assistant United States Attorney


Dated: April 28, 2017

/s/ _____
EDWIN PRATHER
PRATHER LAW OFFICES
Attorneys for Defendant
CARLOS GUERRERO-ELENES

[PROPOSED] ORDER

GOOD CAUSE APPEARING and per the parties' stipulation, IT IS HEREBY ORDERED
that the status/possible change of plea hearing on May 3, 2017, be continued to ~~June 6, 2017~~,
June 7, 2017
at 2:15 p.m. The time from May 3, 2017, through and including ~~June 6, 2017~~, shall be time
excluded from the Speedy Trial Act, in order to ensure the reasonable time necessary for
effective preparation and continuity of counsel, pursuant to Title 18, United States Code
Sections 3161(b), (h)(7)(A), (h)(7)(B)(iv). The supervised release matter, CR 07-0645 MMC,
currently set for May 3, 2017, shall also be continued to ~~June 6, 2017~~, at 2:15 pm.

Dated: May 1, 2017


THE HONORABLE MAXINE M. CHESNEY
UNITED STATES SENIOR DISTRICT JUDGE